

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

NO. 3:21-CR-435-N

FREDERICK ORJI (07)

FACTUAL RESUME

In support of Frederick Orji's plea of guilty to the offense in Count One of the indictment, Orji, the defendant, Taly Haffar, the defendant's attorney, and the United States of America (the government) stipulate and agree to the following:

ELEMENTS OF THE OFFENSE

To prove the offense alleged in Count One of the indictment, charging a violation of 18 U.S.C. § 1349, that is, Conspiracy to Commit Wire Fraud, the government must prove each of the following elements beyond a reasonable doubt:¹

- First.* That the defendant and at least one other person made an agreement to commit the crime of wire fraud as charged in the indictment; and
- Second.* That the defendant knew the unlawful purpose of the agreement and joined in it willfully, that is, with the intent to further the unlawful purpose.

The elements of wire fraud, in violation of 18 U.S.C. § 1343, are as follows:²

- First.* That the defendant knowingly devised or intended to devise a

¹ Adapted from Fifth Circuit Pattern Jury Instruction 2.15A (5th Cir. 2019) (Conspiracy to Commit Offense, 18 U.S.C. § 371), 18 U.S.C. § 1349, and *United States v. Jones*, 733 F.3d 574, 584 (5th Cir. 2013) (stating "Section 1349 does not contain an overt-act requirement").

² Fifth Circuit Pattern Jury Instruction 2.57 (5th Cir. 2019).

scheme to defraud as charged in the indictment, that is to fraudulently induce romance scam victims to make wire transfers into his and his co-conspirators' bank accounts;

Second. That the scheme to defraud employed false material representations, false material pretenses, and false material promises;

Third. That the defendant transmitted or caused to be transmitted by way of wire communications, in interstate commerce, any writing, sign, signal, picture, or sound for the purpose of executing such scheme; and

Fourth. That the defendant acted with a specific intent to defraud.

STIPULATED FACTS

Frederick Orji admits and agrees that:

1. Beginning at least as early as January 24, 2017, and continuing through at least July 11, 2017, within the Northern District of Texas, Dallas Division, and elsewhere, Frederick Orji knowingly and willfully combined, conspired, confederated, and agreed with others known and unknown to the grand jury, to commit the following offense, namely, to knowingly and willfully devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing and attempting to execute the scheme to defraud did knowingly and willfully transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce writings, signs, signals, pictures, and sounds, specifically, wire transfers of funds from romance scam victims into his and his co-conspirators' bank accounts, in violation of 18 U.S.C. §§ 1349 and 1343.

2. Frederick Orji further admits that from January to July 2017, he and his co-conspirators made materially false and fraudulent pretenses, representations, and promises to individuals they targeted on dating websites about their identities to induce the targets of the romance scams to send them funds and that they used the proceeds received from the romance scams for their own benefit and for purposes other than those represented to the romance scam victims.

3. Frederick Orji further admits that it was part of the conspiracy and scheme and artifice to defraud, and among the manner and means by which he and his co-conspirators carried out the conspiracy, that:

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- a. ~~He and his~~ co-conspirators targeted older, often widowed or divorced individuals, with savings, as romantic interests on dating websites such as Bumbledate.com and Match.com;
 - b. At least one of the co-conspirators created false and fraudulent identities and backgrounds on dating websites to appear to be individuals living in the United States to gain the romance victims' confidence and trust;
 - c. At least one of the co-conspirators often communicated with their romance scam victims through the dating websites as well as via email and text but never met their victims in person;
 - d. After developing the romance victims' confidence and trust, at least one of the co-conspirators falsely and fraudulently claimed that they had to travel abroad for business and then falsely and fraudulently claimed they were unable to access their bank accounts in the United States;

- e. At least one of the co-conspirators then directed the romance scam victims to send money to specific accounts under false and fraudulent pretenses;
- f. He and his co-conspirators typically removed the funds received from romance scams victim from the account that initially received them within days by making cash withdrawals, buying cashier's checks, or transferring the funds to other accounts;
- g. Once a romance scam victim had sent money to one co-conspirator, that victim was often instructed to send money to other co-conspirators;
- h. After he and his co-conspirators depleted the victims of all funds the victims were able and willing to send, often depleting victims' of their entire savings, the co-conspirators stopped communicating with the victims.

4. Frederick Orji admits that it was part of the conspiracy and scheme and artifice to defraud, and among the manner and means by which he and his co-conspirators carried out the conspiracy, that:

- a. On or about March 23, 2017, one or more conspirators using the name "Wayne Power," who was purportedly working on an oil rig in Alaska, caused victim JSK, met through dating website Bumble.com, to wire \$40,000 from her Wells Fargo bank account ending in 9516 in Santa Barbara, California, to an account ending in 1122 held at Citibank, N.A. in Brooklyn, New York, in the name of UFO Trading whose sole

signatory is Frederick Orji, purportedly for “Additional Parts and Expertise”;

- b. On or about March 27, 2017, Frederick Orji wired \$37,000 from his UFO Trading account at Citibank to a different UFO Trading account he controlled at Wells Fargo ending in 5588;
- c. On or about March 28, 2017, in two separate \$10,000 transactions, Frederick Orji withdrew a total of \$20,000 from his Wells Fargo ending in 5588 from the Wells Fargo branch located at 2000 N. Collins St., Arlington, Texas, within the Northern District of Texas;
- d. On or about March 30, 2017, Frederick Orji withdrew another \$14,000, from his Wells Fargo ending in 5588 from the Wells Fargo branch located at 2000 N. Collins St., Arlington, Texas, within the Northern District of Texas;
- e. On or about June 5, 2017, one or more conspirators using the name “Wayne Power,” caused a different victim whose initials are JDK, met through Bumble.com, to wire \$35,000 from her Bank of America bank account ending in 2149 in Fountain Valley, California, to an account ending in 1122 held at Citibank, N.A. in Brooklyn, New York, in the name of UFO Trading (and nicknamed Wayne Enterprises LLC) whose sole signatory is Frederick Orji, purportedly to pay for “tents.”

- f. On or about June 7, 2017, Frederick Orji sent a wire \$29,750 from account ending in 1122 to an account ending 3250 held at Houston Federal Credit Union in Sugarland, Texas, in the name of "Bunsunad."
- g. On or about June 9, 2017, one or more conspirators using the name "Wayne Power" caused victim JDK to wire \$10,000 from her Bank of America bank account ending in 2149 in Fountain Valley, California, to an account ending in 1122 held at Citibank, N.A. in Brooklyn, New York, in the name of UFO Trading (and nicknamed Wayne Enterprises LLC) whose sole signatory is Frederick Orji, purportedly to pay for more tents.
- h. On or about June 12, 2017, Frederick Orji wired \$6,100 from his Citibank account ending in 1122 to an account ending 9165 held at Bank of America in Brooklyn, New York, in the name of "chika peace madu." On June 14, 2017, Frederick Orji wired \$7,598 from the account ending in 1122 to an account ending 3250 held at Houston Federal Credit Union in Sugarland, Texas, in the name of "Bunsunad."

5. Frederick Orji further admits that he knew there was an agreement to commit wire fraud and that he joined in it willfully, with the intent to further its unlawful purpose.


6. Frederick Orji further admits that the scheme to defraud as described herein was executed through sophisticated means.

7. Frederick Orji admits that, during the conspiracy, he defrauded victims of at least \$233,587.92, which represents proceeds of the artifice and scheme to defraud.

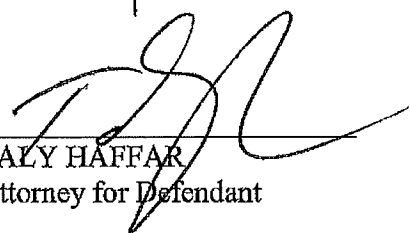
8. The defendant agrees that the defendant committed all the essential elements of the offense. This factual resume is not intended to be a complete accounting of all the facts and events related to the offense charged in this case. The limited purpose of this statement of facts is to demonstrate that a factual basis exists to support the defendant's guilty plea to Count One of the indictment.

AGREED TO AND SIGNED this 16th day of May, 2022.

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